



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

NOV 18 2004

Mr. Edmond J. Thomas
Chief, Office of Engineering and Technology
Federal Communications Commission
445 - 12th Street, N.W.
Washington, DC 20554

RE: *MARITEL, INC and MOBEX NETWORK SERVICES, LLC Petitions for Rule Making to Amend the Commission's Rules to Provide Additional Flexibility for AMTS and VHF Public Coast Station Licensees*, Notice of Proposed Rulemaking, WT Docket No. 04-257, FCC 04-171.

Dear Mr. Thomas:

The National Telecommunications and Information Administration (NTIA), an Executive Branch agency within the Department of Commerce, manages and authorizes the Federal Government's use of the radio frequency spectrum. The Federal Communications Commission (FCC) recently published a proposed rule in the Federal Register seeking comments and reply comments in the above-referenced proceeding in which MARITEL, INC and MOBEX NETWORK SERVICES, LLC's seek additional flexibility for public coast station licensees. NTIA hereby forwards and supports the attached reply comments that were provided to NTIA by the U.S. Department of Homeland Security.

NTIA looks forward to working with the FCC on this item and if you have any questions regarding these comments, please contact Gary Patrick, Spectrum Engineering and Analysis Division, of my staff at (202) 482-9132.

Sincerely,

Fredrick R. Wendland
Associate Administrator
Office of Spectrum Management

Enclosure



Homeland Security

November 12, 2004

Mr. Fred Wentland
Associate Administrator, Office of Spectrum Management
National Telecommunications and Information Administration
Herbert C. Hoover Building
1401 Constitution Ave., N.W.
Washington, D.C. 20230

RE: FCC WT Docket No. 04-257, Petitions for Rule Making to Amend the Commission's Rules to Provide Additional Flexibility for AMTS and VHF Public Coast Station Licensees

Dear Mr. Wentland:

The U.S. Department of Homeland Security (DHS) requests that you forward these late Reply Comments related to the above-referenced proceeding to the Federal Communications Commission (FCC). These Reply Comments fully support the U.S. Coast Guard's (Coast Guard) position in their comments regarding the need for VHF maritime spectrum to be allocated for interoperability between first responders and vessels.

Just as there is an interoperability requirement for first responders on land, a critical requirement exists for interoperability between and among first responders and other users of US waterways. DHS and the public safety community have made great strides in attempting to assure that various first responder entities are able to easily communicate with each other in response to the security of the US homeland and the protection and safety of life and property. The safety and protection of territorial waters, ports and waterways, is an integral element of our national homeland security strategy. Emergencies on the navigable waters of the United States necessarily require communications among vessels and between vessels and shore facilities. While there are upwards of ten million marine radios installed on every vessel of any size in US territorial waters, there is no specific channel designated for communications between these vessels and public safety entities. Furthermore, because the VHF Public Coast (VPC) station frequencies are the only internationally interoperable VHF frequencies employed by all foreign and domestic vessels, the most logical spectrum for an interoperable first responder channel would be within this block of frequencies so it is available to all vessels.

Additionally, the criticality of these communications requires that the channel designated for interoperable communications be able to employ repeaters to ensure the widest area coverage possible. DHS understands that the only place in the VHF spectrum where repeaters can be authorized is in the VPC allocation.

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DHS appreciates the opportunity to submit these Reply Comments and urges the FCC, while deciding the issues involved in this proceeding, to consider the requirement for a VHF Public Coast station frequency for interoperability between first responders and vessels.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ralph Robles". The signature is fluid and cursive, with the first name "Ralph" being more prominent than the last name "Robles".

Ralph Robles
Representative
Interdepartment Radio Advisory Committee

cc:

Mr. Sean Thrash, DHS WMO Mr.
James Dowries, DHS WMO Mr. Terry
Stockholm, DHS WMO CAPT
Leonard Ritter, USCG Mr. Joseph
Hersey, USCG